

2-751165

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ZIM AMERICAN INTEGRATED  
SHIPPING SERVICES, INC.,

Plaintiff,

07 CIV. 3675 (BSJ)

- against -

MOTION FOR ENTRY  
OF JUDGMENT BY  
DEFAULT

ANDERSON INTERNATIONAL  
GLOBAL, LLC, a/k/a WORLDWIDE  
PAPER CO.,

Defendant.

-----X

PLEASE TAKE NOTICE that upon the affidavits of Albert J. Avallone, Esq., with Exhibits annexed thereto and Adrienne James, and upon all prior papers and proceedings herein, plaintiff ZIM AMERICAN INTEGRATED SHIPPING SERVICES, INC. will move this Honorable Court at the United States District Court for the Southern District of New York, 500 Pearl St., New York, NY, before the Hon. Barbara S. Jones, D.J., in a Courtroom and at a time to be set by the Court, for the entry of judgment by default in favor of plaintiff and against defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO. due to defendant's failure to respond to the Complaint, pursuant to Fed.R.Civ.P. 12.

Dated: New York, New York  
August 16, 2007

LAW OFFICES OF  
ALBERT J. AVALLONE & ASSOCIATES

By \_\_\_\_\_

  
Albert J. Avallone - AA1679  
Attorneys for Plaintiff  
ZIM AMERICAN INTEGRATED  
SHIPPING SERVICES, INC.  
551 Fifth Avenue, Suite 1625  
New York, NY 10176  
(212) 696-1760

**AFFIDAVIT OF SERVICE BY MAIL**

CITY OF NEW YORK      )  
STATE OF NEW YORK      ) SS:  
COUNTY OF NEW YORK      )

Albert J. Avallone, being duly sworn, deposes and says that he is a member of the Law Offices of Albert J. Avallone & Associates, attorneys for plaintiff herein.

That on the 16th day of August , 2007, he served the within  
Motion for Entry of Judgment by Default

upon the following:

Anderson International Global, LLC  
a/k/a Worldwide Paper Co.  
c/o Law Offices of Andrew Sagartz  
1880 W. Winchester Road, Suite 206  
Libertyville, IL 60048

by depositing (a) true copy(ies) of the same securely enclosed in (a) postpaid wrapper(s) in a Post Office Box regularly maintained by the United States Government at 551 Fifth Avenue, New York, NY 10176, directed to the above mentioned individual(s) at his (their) respective address(es) above, that (these) being the address(es) within the State designated by him (them) for that purpose upon the preceding papers in this action or the place where he (they) then kept an office, between such places, there then was and now is a regular communication by mail.

Deponent is over the age of 18 years.

Sworn to before me this  
10th day of August, 2007.

Dorothy C. Merite  
DOROTHY C. MERITE  
Notary Public, State of New York  
No. 31-4981997  
Qualified in New York County  
by Commission Expires 3/12/10